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VIA ELECTRONIC MAIL

ROBERT W. WHETZEL

DIRECTOR

The Honorable Joseph J. Farnan, Jr. United States District Court District of Delaware 844 King Street Wilmington, DE 19801

Re: L.G. Philips LCD Co. Ltd. v. Tatung Company et. al., C.A. No. 05-292 (JJF)

Dear Judge Farnan:

We write with respect to Plaintiff's Motion To Compel Deposition Testimony And For Sanctions, and Plaintiff's Second Motion To Compel Deposition Testimony And For Sanctions which were filed on May 25 and 26 respectively (the "Motions"). Notably absent from the Motions is a statement certifying that Plaintiff "made a reasonable effort to reach agreement" on the matters set forth in the Motions as required by Delaware District Court Local Rule 7.1.1. In fact, Plaintiff never contacted Defendants prior to filing the Motions.

Consistent with the Local Rules and long-standing Delaware practice, the parties should make a good faith effort to resolve those disputes before the Court expends its resources. Defendants have requested Plaintiff to withdraw the Motions. Plaintiff has taken the position that the colloquy between counsel during the depositions satisfies the Local Rule requirement to meet and confer. Defendants disagree. The parties should engage in a meaningful meet and confer, and if the parties are unable to reach agreement on the issues in dispute, Plaintiff can refile the Motions and Defendants will respond pursuant to the Scheduling Order entered in this action.

If the Court should have any questions or concerns, undersigned counsel remains available at the Court's convenience.

Respectfully;

Robert W. Whetzel

RWW/III

cc: Richard D. Kirk, Esquire (By Electronic Filing and Hand Delivery)

Gaspare J. Bono, Esquire (By Telecopy)